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DEC 14 2011

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**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Shannon Estese, pro se,

Plaintiff,

vs,

DORIAN B LASAINE & ASSOC, PC

11cv8867

Judge Ruben Castillo
Magistrate Martin C. Ashman

Defendant.

COMPLAINT

PRELIMINARY STATEMENT

1.

This is an action for damages brought from violations of the Fair Credit Reporting Act (FCRA)
15 U.S.C. §1681 *et seq.*

JURISDICTION

2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681p.

FACTUAL ALLEGATIONS

3. On Jan.21,2010

Defendant initiated a hard pull of Plaintiff's credit report from Trans Union without permissible purpose.

COUNT I

VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681

WILLFUL NON-COMPLIANCE BY DEFENDANT, DORIAN B LASAINE & ASSOC

4. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

5. **DORIAN B LASAINE & ASSOC.** is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

6. **DORIAN B LASAINE & ASSOC.** willfully violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) **DORIAN B LASAINE & ASSOC.** willfully violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 against **DORIAN B LASAINE & ASSOC.** for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n.

COUNT II

VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681

NEGLIGENT NON-COMPLIANCE BY DEFENDANT DORIAN B LASAINE & ASSOC.

7. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

8. **DORIAN B LASAINE & ASSOC.** is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

9. DORIAN B LASAINE & ASSOC. negligently violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) **DORIAN B LASAINE & ASSOC.** negligently violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 against **DORIAN B LASAINE & ASSOC.** for actual damages, and attorney's fees and costs, pursuant to 15 U.S.C. § 1681o.

WHEREFORE, Plaintiff demands judgment for damages against **DORIAN B LASAINE & ASSOC.** and \$2,000 for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n (a) (3) and 15 U.S.C. §1681o (a)

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Respectfully submitted this 14th day of dec. 2011

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